

**Subject:** RE: 2024-12-5 Bazile, Jerome Subpoena Acknowledgment Letter Subpoena in Tinajero v. Chicago, et al., Case No. 24 C 1598  
**From:** DAVID ADELMAN <David.Adelman@cookcountysao.org>  
**To:** Joel Flaxman <jaf@kenlaw.com>  
**Cc:** "Jerome Bazile Jr." <Jerome.bazile@cookcountysao.org>, Beau Reeves <beau.reeves@cookcountysao.org>, Alexis Loreda <Alexis.Loreda@cookcountysao.org>, Sherry Mack <Sherry.Mack@cookcountysao.org>, Kenneth Flaxman <knf@kenlaw.com>  
**Date Sent:** Friday, March 14, 2025 10:31:13 AM GMT-05:00  
**Date Received:** Friday, March 14, 2025 10:31:19 AM GMT-05:00

That is correct. Also, we do not see a basis for the need for such documents nor how they are relevant.

Thank you.

**Please note that my email address has changed to [david.adelman@cookcountysao.org](mailto:david.adelman@cookcountysao.org)**



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**From:** Joel Flaxman <jaf@kenlaw.com>  
**Sent:** Friday, March 14, 2025 10:24 AM  
**To:** DAVID ADELMAN <David.Adelman@cookcountysao.org>  
**Cc:** Jerome Bazile Jr. <Jerome.bazile@cookcountysao.org>; Beau Reeves <beau.reeves@cookcountysao.org>; Alexis Loreda <Alexis.Loreda@cookcountysao.org>; Sherry Mack <Sherry.Mack@cookcountysao.org>; Kenneth Flaxman <knf@kenlaw.com>  
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Thanks David. You mean 820 ILCS 40/8, right?

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On Fri, Mar 14, 2025 at 10:17 AM DAVID ADELMAN <[David.Adelman@cookcountysao.org](mailto:David.Adelman@cookcountysao.org)> wrote:

Joel,

I am glad we were able to connect. As I mentioned, CCSAO objects to disclosure of employment evaluations as the statutes, 820 ICLS 40/8 and 820 ICLS 40/11 prohibit disclosure of evaluations that are more than four years old and Mr. Rubenstein left CCSAO employment longer than that.

Also, as we discussed, please have any order requiring us to produce evaluations be subject to a protective order.

Thank you.

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